

**QUINN EMANUEL URQUHART & SULLIVAN, LLP**

Diane M. Doolittle (CA Bar No. 142046)  
dianedoolittle@quinnemanuel.com  
Sara Jenkins (CA Bar No. 230097)  
sarajenkins@quinnemanuel.com  
555 Twin Dolphin Drive, 5th Floor  
Redwood Shores, CA 94065  
Telephone: (650) 801-5000  
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted pro hac vice)  
andrewschapiro@quinnemanuel.com  
Teuta Fani (admitted pro hac vice)  
teutafani@quinnemanuel.com  
191 N. Wacker Drive, Suite 2700  
Chicago, IL 60606  
Telephone: (312) 705-7400  
Facsimile: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)  
stephenbroome@quinnemanuel.com  
Viola Trebicka (CA Bar No. 269526)  
violatrebicka@quinnemanuel.com  
Crystal Nix-Hines (Bar No. 326971)  
crystalnixhines@quinnemanuel.com  
Alyssa G. Olson (CA Bar No. 305705)  
alyolson@quinnemanuel.com  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100

Josef Ansorge (admitted pro hac vice)  
josefansorge@quinnemanuel.com  
Xi ("Tracy") Gao (CA Bar No. 326266)  
tracygao@quinnemanuel.com  
Carl Spilly (admitted pro hac vice)  
carlspilly@quinnemanuel.com  
1300 I Street NW, Suite 900  
Washington D.C., 20005  
Telephone: (202) 538-8000  
Facsimile: (202) 538-8100

Jomaire Crawford (admitted pro hac vice)  
jomairecrawford@quinnemanuel.com  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100

Jonathan Tse (CA Bar No. 305468)  
jonathantse@quinnemanuel.com  
50 California Street, 22nd Floor  
San Francisco, CA 94111  
Telephone: (415) 875-6600  
Facsimile: (415) 875-6700

*Attorneys for Defendant Google LLC*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**GOOGLE LLC'S SUPPLEMENT TO  
ADMINISTRATIVE MOTION  
UPDATING THE COURT ON ITS  
PRESERVATION IMPLEMENTATION  
EFFORTS AND SEEKING RELIEF  
FROM THE JULY 30 DEADLINE  
IMPOSED BY THE JULY 15, 2022  
PRESERVATION ORDER (DKT. 630)**

Judge: Hon. Susan van Keulen

1 In response to the Court’s Order following July 28, 2022 Status Conference in *Calhoun v.*  
2 *Google* (Case No. 4:20-cv-05146-YGR, Dkt. 789), Google hereby provides anticipated dates of  
3 completion for items identified in its administrative motion as “in progress” or for which it has  
4 requested additional time.

5 The engineering and resources required to implement aspects of the Court’s preservation  
6 order (Dkt. 630) are unprecedented for Google. The Order requires numerous subject matter experts  
7 to re-engineer Google systems and processes, and in some cases to create new systems and  
8 processes. As these experts have worked diligently towards meeting the Court’s deadline, new  
9 challenges have arisen on an almost daily basis, requiring more meetings, creative thinking, and  
10 consultation with counsel to ensure the solutions ultimately arrived at satisfy the Court’s objective.

11 The problem is not merely one of manpower or server space—though those are issues as  
12 well. Implementing certain aspects of the Court’s Order requires unique skills, experience, and  
13 knowledge of particular data sources that are in limited supply, even at a company the size of  
14 Google. Indeed, to date, 17 Google subject matter experts have been working to design, scope, and  
15 implement the pipelines necessary to meet the order (Dkt. 630). In addition to resources, Google  
16 needs time.

17 Google acknowledges the Court’s admonition that it “will not grant open-ended extensions  
18 or any extension in excess of 30 days.” (4:20-cv-05146-YGR, Dkt. 789 at 2. And Google will  
19 continue to work expeditiously to complete all remaining tasks as quickly as possible. But based on  
20 the complexity of the tasks and progress to date, completion of all tasks in 30 days simply is not  
21 possible.

22 The current status of the preservation projects in progress are set forth below. Upon the  
23 Court’s request, Google is willing to provide more detailed explanations as to each task or answer  
24 specific questions of the Court.

25  
26  
27  
28

Data Source	Responsible Team	Anticipated Date of Completion
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

DATED: July 29, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Andrew H. Schapiro  
Andrew H. Schapiro (admitted *pro hac vice*)  
andrewschapiro@quinnemanuel.com  
Teuta Fani (admitted *pro hac vice*)  
teutafani@quinnemanuel.com  
191 N. Wacker Drive, Suite 2700  
Chicago, IL 60606  
Telephone: (312) 705-7400  
Facsimile: (312) 705-7401  
  
Stephen A. Broome (CA Bar No. 314605)

<sup>1</sup> See Dkt. 587 at 7; Dkt. 587-1, Index ## 2-42, 52-56, 59, 60.

<sup>2</sup> See Dkt. 587-1, Index # 47, 48, 49.

<sup>3</sup> See Dkt. 587-1, Index ## 43, 45.

1 stephenbroome@quinnemanuel.com  
2 Viola Trebicka (CA Bar No. 269526)  
3 violatrebicka@quinnemanuel.com  
4 Crystal Nix-Hines (Bar No. 326971)  
5 crystalnixhines@quinnemanuel.com  
6 Alyssa G. Olson (CA Bar No. 305705)  
7 alyolson@quinnemanuel.com  
8 865 S. Figueroa Street, 10th Floor  
9 Los Angeles, CA 90017  
10 Telephone: (213) 443-3000  
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13 dianedoolittle@quinnemanuel.com  
14 Sara Jenkins (CA Bar No. 230097)  
15 sarajenkins@quinnemanuel.com  
16 555 Twin Dolphin Drive, 5th Floor  
17 Redwood Shores, CA 94065  
18 Telephone: (650) 801-5000  
19 Facsimile: (650) 801-5100

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21 josefansorge@quinnemanuel.com  
22 Xi ("Tracy") Gao (CA Bar No. 326266)  
23 tracygao@quinnemanuel.com  
24 Carl Spilly (admitted *pro hac vice*)  
25 carlspilly@quinnemanuel.com  
26 1300 I. Street, N.W., Suite 900  
27 Washington, D.C. 20005  
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*Attorneys for Defendant Google LLC*

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